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May 10, 2017

Honorable John F. Keenan United States District Judge United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

Re: BSG Resources (Guinea) Limited, et al. v. George Soros and Open Society Foundations, No. 1:17-cv-02726 (JFK)

## Dear Judge Keenan:

We represent Defendant George Soros ("Mr. Soros") in the above-captioned action. Currently, Mr. Soros is required to respond to the Complaint in this action no later than May 19, 2017. We write on behalf of Mr. Soros pursuant to Part 1.E of the Court's Individual Practices to request an extension of time to respond to the Complaint, and to so-order the briefing schedule below. Plaintiffs consent to the adjournment of the deadline for Mr. Soros to respond to the Complaint, and join in the request for the Court to so-order the following schedule:

- Mr. Soros shall answer, move or otherwise respond to the Complaint no later than June 2, 2017. Mr. Soros waives any defense or objection to the Complaint under Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5).
- Plaintiffs shall serve their opposition to Mr. Soros's motion, if any, no later than June 30, 2017.
- Mr. Soros shall serve his reply in support of his motion, if any, no later than July 21, 2017.

The parties' agreement to and request for an order approving the foregoing schedule is without prejudice to any of the parties' rights to seek or oppose discovery. The parties have not previously requested an extension of time for Mr. Soros to respond to the Complaint or for the establishment of a briefing schedule for Mr. Soros's motion. Concurrently with the filing of this letter, we are submitting to the Orders and Judgments Clerk a stipulation executed by respective counsel for Mr. Soros and Plaintiffs that sets forth the foregoing schedule.

Respectfully submitted,

Ioseph T. Bajo

Enclosure

cc: Louis M. Solomon (via ECF)